

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
BID PROTEST**

BLUE ORIGIN FEDERATION, LLC,	)	
Plaintiff,	)	
v.	)	
	)	
THE UNITED STATES,	)	No. 21-1695C
Defendant,	)	Judge Richard A. Hertling
and	)	
	)	
SPACE EXPLORATION TECHNOLOGIES CORP.	)	
Defendant-Intervenor.	)	

**PLAINTIFF’S UNOPPOSED SECOND MOTION FOR LEAVE TO EXCEED PAGE  
LIMIT FOR REPLIES TO CROSS-MOTIONS FOR JUDGMENT ON THE  
ADMINISTRATIVE RECORD**

Plaintiff Blue Origin Federation, LLC (“Blue Origin”), through its undersigned counsel, respectfully moves for an additional ten (10) page extension of the page limit applicable to its Replies to Defendant’s and Defendant-Intervenor’s Cross-Motions for Judgment on the Administrative Record (“MJAR”). Plaintiff seeks leave to file a consolidated reply with a page limit not to exceed (70) pages. In support of this motion, Plaintiff states as follows:

1. On October 6, 2021, Plaintiff filed its Motion for Leave to Exceed Page Limit for Replies to Cross-Motions for Judgment on the Administrative Record (“Motion”) seeking permission to file a consolidated reply with a page limit not to exceed sixty (60) pages. ECF No. 63. The Court granted Plaintiff’s Motion that same day. See ECF No. 64.

2. Here, there are two opposing cross-motion briefs totaling 150 pages. As before, Plaintiff intends to submit one consolidated reply brief responding to the opposing parties’ MJARs. At this time, Plaintiff requests a not-to-exceed page limitation of seventy (70) pages, which is ten (10) additional pages more than previously granted by the Court.

3. Counsel for Defendant and Defendant-Intervenor have advised that they do not object to an additional thirty (10) pages, for a total of seventy (70) pages, for Plaintiff's consolidated reply.

4. Here, Plaintiff is responding to two separate, opposing MJARs, each exceeding 70-plus pages. In order to properly respond to the opposing parties' MJARs, Plaintiff respectfully submits an additional ten (10) pages, for a total of seventy (70) pages, is required. For example, the United States included its Motions to Dismiss pursuant to RCFC 12(b)(1) and 12(b)(6) with its Cross-Motion, which was not expressly provided for under the Court's Scheduling Order. Additionally, while there is some overlap in the arguments contained in the Defendant's and Defendant-Intervenor's Cross-Motions, there are also different arguments asserted on highly complex and technical matters, which Plaintiff's consolidated reply will need to address. While Plaintiff hoped to address these matters within sixty (60) pages, Plaintiff submits that an additional ten (10) pages, or a page limit not-to-exceed seventy (70) pages, is required.

5. In light of the foregoing, and for good cause shown, Plaintiff respectfully requests that this Court grant its unopposed second request for leave to file a single consolidated Reply to Defendant's and Defendant-Intervenor's Cross-Motions not exceeding sixty (70) pages.

Dated: October 12, 2021

Respectfully submitted,



*Of Counsel:*

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